

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA

v.

JOHN HOLLAND,

Defendant.

**CASE NO.:
1:17-CR-00234-AT-CMS**

CONSENT MOTION SEEKING AUTHORIZATION TO TRAVEL

Defendant John Holland, by and through undersigned counsel, hereby respectfully requests that the Court authorize the Pre-Trial Services Office to return his passport and permit him to travel for a family trip to Mexico and Canada in May 2025 to early June 2025. Upon returning to the United States, Mr. Holland will return his passport to Pre-Trial Services.

BACKGROUND

Mr. Holland has been under indictment and subject to various bond conditions for over eight years. During this time, he has fully abided by his pre-trial conditions of release. He is not a flight risk. The Court has modified Mr. Holland's conditions of release, including terminating the requirement that Mr. Holland report to pretrial services or seek approval to travel within the continental United States. (Doc. 559). The Court allowed Mr. Holland both to travel outside the continental United States and to renew his passport. (Doc. 634). The Court then allowed Mr. Holland to

briefly retain that passport so he could travel for a family trip to Europe in late April through early May 2024. (Doc. 640). And the Court allowed Mr. Holland again to briefly retain his passport for a family trip to Ecuador, Colombia, and Panama in December 2024. (Doc. 647).

REQUEST TO TRAVEL

In light of the foregoing circumstances and Mr. Holland's compliance with all pretrial conditions of release, Mr. Holland respectfully requests authorization, consistent with the terms of the Court's prior modifications of his bond conditions, to have his passport returned and to permit him to travel for a family trip to Mexico and Canada in May 2025 to early June 2025. Mr. Holland would continue to abide by the Order Setting Conditions of Release, including returning the passport to Pre-Trial Services after he returns from his trip and seeking approval of Pre-Trial Services for any additional such travel outside of the continental United States. Mr. Holland contacted both the United States and Pre-Trial Services regarding this motion. Both stated that they did not oppose.

WHEREFORE, Mr. Holland respectfully requests that the Court grant this Motion and enter an order directing Pre-Trial Services to return Mr. Holland's passport and permitting him to travel for a family trip to Mexico and Canada in May 2025 to early June 2025. Upon returning to the United States, Mr. Holland will return his passport to Pre-Trial Services.

For the Court's convenience, a Proposed Order is attached.

Respectfully submitted this 14th day of April, 2025.

/s/ Richard H. Deane, Jr.

Richard H. Deane, Jr.
Georgia Bar No. 214875
rhdeane@jonesday.com

JONES DAY
1221 Peachtree Street, N.E., Suite 400
Atlanta, GA 30361
Tel: 404-581-3939
Fax: 404-581-8330
LEAD COUNSEL

Henry W. Asbill
Schertler Onorato Mead & Sears, LLP
555 13th Street, N.W., Suite 500 West
Washington, D.C. 20004
hasbill@schertlerlaw.com
Tel: 202-675-4406
Admitted Pro Hac Vice

Amy Levin Weil
Georgia Bar No. 448113
The Weil Firm, LLC
511 East Paces Ferry Road, N.E.
Atlanta, GA 30305
alw@theweelfirm.com
Tel: 404-581-0000

Attorneys for Defendant John Holland

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to L.R. 5.1B and 7.1D of the Northern District of Georgia, that the foregoing CONSENT MOTION SEEKING AUTHORIZATION TO TRAVEL complies with the font and point selections approved by the court in L.R. 5.1B. The foregoing pleading was prepared on a computer using 14-point Times New Roman font.

Prepared this 14th day of April, 2025.

/s/ Richard H. Deane, Jr. _____
Richard H. Deane, Jr.

Attorney for Defendant John Holland